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5 Attorney for Defendants
DARREN ROBERTSON, QUAIL SURGICAL AND PAIN
6 MANAGEMENT CENTER and NORTHERN NEVADA ASC
MANAGEMENT
7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 PATTY L. KING,

12 Plaintiff,

13 vs.

14 DARREN ROBERTSON, an individual,
QUAIL SURGICAL AND PAIN
15 MANAGEMENT CENTER, LLC, a
Nevada limited liability company,
16 NORTHERN NEVADA ASC
MANAGEMENT, LLC, a Nevada limited
17 liability company, AND DOES 1-10
INCLUSIVE, BLACK AND WHITE
18 BUSINESS ENTITIES I-X, INCLUSIVE,

19 Defendants.
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Case No. 3:21-cv-00471

**STIPULATION AND ORDER TO FILE
FIRST AMENDED COMPLAINT AND TO
EXTEND DEADLINE TO RESPOND**

[FIRST REQUEST]

22 Defendants DARREN ROBERTSON, QUAIL SURGICAL AND PAIN
23 MANAGEMENT CENTER, LLC, AND NORTHERN NEVADA ASC MANAGEMENT,
24 LLC (collectively “Defendants”), by and through their undersigned counsel KARYN M.
25 TAYLOR, LITTLER MENDELSON P.C., and Plaintiff PATTY L. KING (“Plaintiff”),
26 by and through her undersigned counsel VICTOR ALLEN PERRY, hereby stipulate that,
27 without further motion to the court, Plaintiff shall have to **November 17, 2021** to file her
28 first amended Complaint.

1 The parties further stipulate that Defendants will have to **December 3, 2021**, to
2 file its Answer or to otherwise respond to Plaintiff's amended Complaint. The extension
3 is necessary in light of conflicts on counsel's calendar as well as the Thanksgiving
4 holiday and is not for the purpose of delay.

5 This is the first request for an extension of these deadlines.

6 Dated: November 9, 2021

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8 Respectfully submitted,

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10 /s/ Victor Alan Perry
VICTOR ALAN PERRY, ESQ.

11 Attorney for Plaintiff

Respectfully submitted,

12 /s/ Karyn M. Taylor
KARYN M. TAYLOR, ESQ.
LITTLER MENDELSON, P.C.

13 Attorney for Defendants
DARREN ROBERTSON, QUAIL
SURGICAL AND PAIN MANAGEMENT
14 CENTER, and NORTHERN NEVADA ASC
MANAGEMENT

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17 **IT IS SO ORDERED.**

18 Dated: November 9, 2021.

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21 UNITED STATES MAGISTRATE JUDGE
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